

## STATEMENT OF BASIS

as required by LAC 33:IX.3109, for draft **Louisiana Pollutant Discharge Elimination System Permit No. LA0039641; AI 19370; PER20070001** to discharge to waters of the **State of Louisiana** as per LAC 33:IX.2311.

The **permitting authority** for the Louisiana Pollutant Discharge Elimination System (LPDES) is:

Louisiana Department of Environmental Quality  
Office of Environmental Services  
P. O. Box 4313  
Baton Rouge, Louisiana 70821-4313

- I.           **THE APPLICANT IS:**   Town of New Llano  
New Llano Wastewater Treatment Facility  
P.O. Box 306  
New Llano, LA 71461
  
- II.           **PREPARED BY:**       Eura DeHart
  
- DATE PREPARED:**   January 9, 2008
  
- III.          **PERMIT ACTION:**   reissue LPDES permit LA0039641, AI 19370, PER20070001
  
- LPDES application received: September 4, 2007
  
- EPA has not retained enforcement authority.
  
- LPDES permit effective: March 1, 2003
- LPDES permit expires: February 29, 2008

### IV.           **FACILITY INFORMATION:**

- A.       The application is for the discharge of treated sanitary wastewater from a publicly owned treatment facility serving the Town of New Llano.
  
- B.       The permit application does not indicate the receipt of industrial wastewater.
  
- C.       The facility is located approximately one-half mile north of Rogers Loop, off U.S. Highway 171, adjacent to the southeastern border of the New Llano Town limits, Vernon Parish.
  
- D.       The treatment facility consists of an extended aeration treatment system. Disinfection is by ultraviolet light.
  
- E.       Outfall 001
  - Discharge Location:   Latitude 31° 6' 36" North  
                                  Longitude 93° 15' 51" West
  - Description:           treated sanitary wastewater
  - Design Capacity:       0.75 MGD
  - Type of Flow Measurement which the facility is currently using:  
                                  Combination Flow Meter / Continuous Recorder

## Statement of Basis

LA0039641; AI 19370; PER20070001

Page 2

**V. RECEIVING WATERS:**

The discharge is into Bayou Castor; thence into Bayou Anacoco in segment 110506 of the Sabine River Basin. This segment is not listed on the 303(d) list of impaired waterbodies.

The designated uses and degree of support for Segment 110506 of the Sabine River Basin are as indicated in the table below<sup>1/</sup>:

Overall Degree of Support for Segment 110506	Degree of Support of Each Use						
	Primary Contact Recreation	Secondary Contact Recreation	Propagation of Fish & Wildlife	Outstanding Natural Resource Water	Drinking Water Supply	Shell fish Propagation	Agriculture
Full	Full	Full	Full	N/A	N/A	N/A	N/A

<sup>1/</sup>The designated uses and degree of support for Segment 110506 of the Sabine River Basin are as indicated in LAC 33:IX.1123.C.3, Table (3) and the 2004 Water Quality Management Plan, Water Quality Inventory Integrated Report, Appendix A, respectively.

**VI. ENDANGERED SPECIES:**

The receiving waterbody, Subsegment 110506 of the Sabine River Basin, is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U. S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated October 21, 2005 from Watson (FWS) to Gautreaux (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

**VII. HISTORIC SITES:**

The discharge is from an existing facility location, which does not include an expansion beyond the existing perimeter. Therefore, there should be no potential effect to sites or properties on or eligible to for listing on the National Register of Historic Places, and in accordance with the 'Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits' no consultation with the Louisiana State Historic Preservation Officer is required.

**VIII. PUBLIC NOTICE:**

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit modification and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page

Statement of Basis

LA0039641; AI 19370; PER20070001

Page 3

of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

For additional information, contact:

Mr. Eura DeHart  
Permits Division  
Department of Environmental Quality  
Office of Environmental Services  
P. O. Box 4313  
Baton Rouge, Louisiana 70821-4313

## Statement of Basis

LA0039641; AI 19370; PER20070001

Page 4

**IX. PROPOSED PERMIT LIMITS:**

Subsegment 110506, Bayou Anacoco, from Anacoco Lake to Cypress Creek, is not listed on LDEQ's Final 2004 303(d) List as impaired, and to date no TMDL's have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.

**Final Effluent Limits:****OUTFALL 001**

Final limits shall become effective on the effective date of the permit and expire on the expiration date of the permit.

Effluent Characteristic	Monthly Avg. (lbs./day)	Monthly Avg.	Weekly Avg.	Basis
CBOD <sub>5</sub>				Limits are set in accordance with the Wasteload Allocation for Bayou Castor (EDMS Document No. 30284270)
April – October	63	10 mg/l	15 mg/l	
November – March	125	20 mg/l	30 mg/l	
TSS				The TSS effluent limitations shall be based on a case-by-case evaluation of the treatment technology being utilized at a facility. Therefore, a Technology Based Limit has been established through Best Professional Judgement for the type of treatment technology utilized at this facility and the previous permit.
April – October	94	15 mg/l	23 mg/l	
November – March	125	20 mg/l	30 mg/l	
Ammonia-Nitrogen	63	10 mg/l	20 mg/l	Limits are set in accordance with the Wasteload Allocation for Bayou Castor (EDMS Document No. 30284270)
Dissolved Oxygen				Limits are set in accordance with the Wasteload Allocation for Bayou Castor (EDMS Document No. 30284270)
April – October	N/A	7 mg/l	N/A	
November – March	N/A	5 mg/l	N/A	

## Statement of Basis

LA0039641; A1 19370; PER20070001

Page 5

**Other Effluent Limitations:****1) Fecal Coliform**

The discharge from this facility is into a water body which has a designated use of Primary Contact Recreation. According to LAC 33:IX.1113.C.5.a, the fecal coliform standards for this water body are 200/100 ml and 400/100 ml. Therefore, the limits of 200/100 ml (Monthly Average) and 400/100 ml (Weekly Average) are proposed as Fecal Coliform limits in the permit. These limits are being proposed through Best Professional Judgement in order to ensure that the water body standards are not exceeded, and due to the fact that existing facilities have demonstrated an ability to comply with these limitations using present available technology.

**2) pH**

According to LAC 33:IX.3705.A.1., POTW's must treat to at least secondary levels. Therefore, in accordance with LAC 33:IX.5905.C., the pH shall not be less than 6.0 standard units nor greater than 9.0 standard units at any time.

**3) Solids and Foam**

There shall be no discharge of floating solids or visible foam in other than trace amounts in accordance with LAC 33:IX.1113.B.7.

**X.****PREVIOUS PERMITS:**

LPDES Permit No. LA0039641: Issued: February 6, 2003

Expires: February 28, 2008

<u>Effluent Characteristics</u>	<u>Discharge Limitations</u>		<u>Monitoring Requirements</u>	
	<u>Daily Avg.</u>	<u>Daily Max.</u>	<u>Measurement Frequency</u>	<u>Sample Type</u>
Flow	Report	Report	Continuous	Recorder
CBOD <sub>5</sub>				
April-October	10 mg/l	15 mg/l	2/month	Grab
November-March	20 mg/l	30 mg/l	2/month	Grab
Total Suspended Solids				
April-October	15 mg/l	23 mg/l	2/month	Grab
November-March	20 mg/l	30 mg/l	2/month	Grab
Ammonia-Nitrogen	10 mg/l	20 mg/l	2/month	Grab
Dissolved Oxygen				
April-October	---	7 mg/l	2/month	Grab
November-March	---	5 mg/l	2/month	Grab
Fecal Coliform Bacteria	200	400	2/month	Grab

**XI.****ENFORCEMENT AND SURVEILLANCE ACTIONS:****A) Inspections**

A site inspection was performed on March 29, 2006 in which all areas observed revealed no apparent problems. It was noted in the inspection that the facility reported an overflow. Another overflow occurred on or around October 8, 2005, which was not reported.

## Statement of Basis

LA0039641; AI 19370; PER20070001

Page 6

**B) Compliance and/or Administrative Orders**

A review of the files indicates that a Notice of Deficiency was issued on May 3, 2006 for failure to report non-compliance, within 24-hours, of the lift station overflow (noted above).

The facility reported 17 overflows at lift stations due to excessive rainfall between January 1, 2003 and December 5, 2007.

**C) DMR Review**

A review of discharge monitoring reports for the period beginning January 1, 2003 through September 30, 2007 has revealed no violations.

**XII.****ADDITIONAL INFORMATION:**

The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving water bodies based upon additional water quality studies and/or TMDL's. The DEQ also reserves the right to modify or revoke and reissue this permit based upon any changes to established TMDL's for this discharge, or to accommodate for pollutant trading provisions in approved TMDL watersheds as requested by the permittee and/or as necessary to achieve compliance with water quality standards. Therefore, prior to upgrading or expanding this facility, the permittee should contact the Department to determine the status of the work being done to establish future effluent limitations and additional permit conditions.

Final effluent loadings (i.e. lbs/day) have been established based upon the permit limit concentrations and the design capacity of 0.75 MGD.

Effluent loadings are calculated using the following example:

$$\text{BOD: } 8.34 \text{ gal/lb} \times 0.75 \text{ MGD} \times 10 \text{ mg/l} = 63 \text{ lb/day}$$

In the previous permit, the loading rates were based on the expected flow of 0.25 MGD, rather than the design capacity of 0.75 MGD. The loading rates in this permit are based on the design capacity of 0.75 MGD. The average flow rate for the prior two years of data submitted on to the Department on DMRs is 0.237983 MGD; and, there have been no violations of the permit in the prior two years. Therefore, monitoring frequency will remain the same as the previous permit.

**Pretreatment Requirements**

Based upon consultation with LDEQ pretreatment personnel, general pretreatment language will be used due to the lack of either an approved or required pretreatment program.

**Pollution Prevention Requirements**

The permittee shall institute or continue programs directed towards pollution prevention. The permittee shall institute or continue programs to improve the operating efficiency and extend the useful life of the facility. The permittee will complete an annual Environmental Audit Report **each year** for the life of this permit according to the schedule below. The permittee will accomplish this requirement by completing the Environmental Audit Form which has been

## Statement of Basis

LA0039641; AI 19370; PER20070001

Page 7

attached to the permit. All other requirements of the Municipal Wastewater Pollution Prevention Program are contained in Part II of the permit.

The audit evaluation period is as follows:

Audit period Begins	Audit Period Ends	Audit Report Completion Date
Effective Date of Permit	12 Months from Audit Period Beginning Date	3 Months from Audit Period Ending Date

**XIII      TENTATIVE DETERMINATION:**

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a new permit for the discharge described in this Statement of Basis.

**XIV      REFERENCES:**

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 8, "Wasteload Allocations / Total Maximum Daily Loads and Effluent Limitations Policy," Louisiana Department of Environmental Quality, 2005.

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 5, "Water Quality Inventory Section 305(b) Report," Louisiana Department of Environmental Quality, 1998.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Chapter 11 - "Louisiana Surface Water Quality Standards," Louisiana Department of Environmental Quality, 2004.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Subpart 2 - "The LPDES Program," Louisiana Department of Environmental Quality, 2004.

Low-Flow Characteristics of Louisiana Streams, Water Resources Technical Report No. 22, United States Department of the Interior, Geological Survey, 1980.

Index to Surface Water Data in Louisiana, Water Resources Basic Records Report No. 17, United States Department of the Interior, Geological Survey, 1989.

LPDES Permit Application to Discharge Wastewater, Town of New Llano, New Llano Wastewater Treatment Facility, September 4, 2007.